

IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MARYLAND GREENBELT  
DIVISION.

Francis Keister

*Jury Demanded*

HD

Rcv'd by: \_\_\_\_\_

PLAINTIFF,

V.

23 CV 2414

USDC - GREENBELT  
'23 SEP 5 PM 12:07

*AV*

Wake County District Attorney Office

Lorrin Freeman Wake County District Attorney  
Office DA

In Her Official and Individual Capacity.

The Government, City of Raleigh and the Raleigh  
NC Police Department In it Official Capacity

*Evette*  
Officer Evette In His Individual and Official  
Capacity *Lywicks*

Officer Windesky In His Individual and Official  
Capacity

Officer Alonso In His Individual and Official  
Capacity

Greyhound Line Inc Raleigh N.C. In it Official Capacity  
*Greyhound Line Inc T&T*

Jane Doe. In Her Individual and Official Capacity  
as an Employee of Greyhound Line Inc.

DEFENDANTS.

BASIC JURISDICTION.

11:42.U.S.C.1983, NCPI 806.50 NCPI 143/291  
AND NCPI 143/300.1 Francis Keister a Resident of  
Maryland is bring this action against all named  
Defendants in Violation of his Civil Rights, Libel,  
Slander and Defamation of Character. This  
Violations also Includes Wrongful Arrest in  
Violation of his constitutional rights. Improper  
Search without a probable cause in Violation of his  
4<sup>th</sup> Amendment to the United States Constitution.

COUNTY OFFICIALS, AND A PRIVATE  
PARTY.

(B) Pro-Se Plaintiff is bringing this action pursuant  
42 U.S.C. 1983 in violation of his Civil Rights and  
other States Rights. This Rights includes false  
arrest, improper search, solitary confinement in  
violation of his civil right under the 4<sup>th</sup> amendment  
to the United States Constitution. States, and Federal

Rights violated include 42 U.S.C 1983 Libel, Slander and Defamation of Character under NCPI 806.50 143 291 143 300.

(D) 1:Plaintiff was unlawfully arrested by the Raleigh NC Police Department on 09/7/2022

2:Plaintiff was unlawfully prosecuted by the Wake County District Attorney for a crime he did not commit.

3: Plaintiff was wrongfully accused of a Trespass at a Greyhound Line Inc Bus Station on 2210 Capital Blvd Raleigh NC 27604 which lead him to spend Days in the Wake County NC jail from September 7<sup>th</sup> 2022, to September 23<sup>rd</sup> 2022.

#### 111:STATEMENT OF CLAIM.

Plaintiff Francis Keister a former Resident of Nashville Tennessee Boarded a Greyhound Bus from Washington D.C. heading to Nashville Tennessee on September 7<sup>th</sup> 2022, with a brief stop in Richmond V.A. and a second stop in Raleigh N.C Greyhound Bus Station when the incident arising to this action took place.



At around 3:00 Am to sometimes between 4:30 Am if Plaintiff could properly recall the arrival time due to duration of event to the time of filing this complaint. During this trip in Raleigh NC Greyhound Bus Station was around 4:00 am to 4:30 am.

Upon the Bus arrival Plaintiff had a brief interaction with one of the Greyhound Bus Drivers Immediately the Bus arrived in Raleigh while all passengers were standing outside the Bus Terminal outside of the Bus Station. During this Interaction a possible call was made to the Raleigh NC Police Department.

Three 3 Police Officials arrived from the Raleigh Police Department NC. Plaintiff had a conversation with the three Officials one Black Male officer, one white Male officer, and a female white officer. I was asked what the matter was I explained to them of one of the Drivers at the Bus Station had pick me out immediately the Bus arrived at the Bus Station. This could be the reason why you guys are Here. after a brief conversation with the officials, upon their returned from talking to the Lady that made the call I was then asked to leave the Bus Station by the Officials. I told the Officials that I was a

Lawful passenger at the Bus Station waiting on my next Bus to Nashville Tennessee how could a Greyhound Bus Driver asked me to leave the Bus station? During that Interaction there was even an attempt to put me in handcuff. My hand were briefly placed behind my back by two of the officials while speaking with me. I was not causing any problem neither prior to their arrival, or during this time I was having word with them.

They walked me outside of the Bus Terminal and take me outside of the Bus Station into the street. They subsequently left. When my Bus arrival time came I went to the Bus Station to get into the Bus to Nashville I was not allowed to onboard the Bus by the Bus Driver. That Bus left. After spending the rest of the night outside on the street, because I was not allowed to enter into the building In the morning I went to Salvation Army and Placed a called to Greyhound Customer Service and explained to them the problem that I was having with Greyhound the Local Greyhound in Raleigh in NC. I provided Customer Service with my Booking Number and it being said that my Booking number heading to

Nashville was still valid. I was then asked by the Greyhound Customer Service agent to go back to the Bus Station and asked to speak with a manager which I did. While I did this the said manager did told me to speak with off the lady at the Bus Station that has being giving hand time. Who made the called to the police. During this time after the manager has left the lady did called the police. Three Raleigh NC Police Department Officers arrived at the Location on 2210 Capital Blvd, Raleigh NC. When they arrived they went into the Building of the Bus Station and briefly spoke with the lady at the station she told them that I was not allowed in the Bus Station, They came back to me asked me to and said that I was Trespassing, and I, m being detained for trespassing. I try to explained to them that I,m a passenger at the station heading to Nashville, how could I be trespassing at the station. Why having this conversation I was then grab by the hands placed my hands behind my backs and placed in hand cuffs.at this time there were 2 two officers. Officer Windesky, and officer Evitta. After being handcuff I was placed in officer Windesky Patrol



Vehicle after I was being search in person. My backpack was then being search by officer Evitta. Officer Windesky joined him after he had placed in to the patrol Vehicle.

While being search, and process in that process a radio called was made for a backup, that brought in officer Alonso in this process a Transferred of Custody was made from OFFICER Windesky to OFFICER ALONSO. I was then asked to leave officer Windesky Patrol Vehicle into Officer Alonso Patrol Vehicle who ended taken me to the Wake County Jail. Upon arrival into Wake County Jail I was then being process Placed photo taken and made my first appearing before a Magistrate for a BOND HEARING.my bond was set at 500.000 Five Hundred Dollars by the Magistrate I was not able to provide that Bond in order to Bond out which lead to Spend those Days in Jails for a crime I did not commit due to a false arrest.

My rights were violated by the Arresting Agency. The Raleigh NC Police Department. The Wake County District Attorney Office in both their official, and in their Individual Capacities.

with any JUDGE on that Day. After several Hours I was then told by a sheriff officer that the case has been dismiss I,m will taken back to the wake county jail shortly by the Sheriff officer that brought me in.

That is how that allege meeting that I was supposed to meet with a Judge ended. I never saw a Day I was discharged and asked to free to go after spending Days in Jail for a crime I did not commit.

A:EVENT OCCOURED AT 2210 capital blvd  
Raleigh NC 27604

Wake County Justice Center 300 S. Salisbury Street  
Raleigh NC 27604

B: Event happened on September 7<sup>th</sup> 2022.

And other Days followed within the same Month in relation to this complaint.

(C) 1:I was wrongfully arrested by the Raleigh NC Police Department.

2:I was wrongfully prosecuted by the Wake County District Attorney.

3: I was wrongfully accused of an act of a crime, for which I was arrested. The act of a Trespass



Greyhound Line Inc and at some point even the Wake County Jail.

The said charges were later asked out after a third Hearing schedule at the Wake County Justice Center. After the September 7<sup>th</sup> Bond Hearing my next Court hearing was schedule for the 15<sup>th</sup> of September of 2022, I did appear for that hearing via a Video Link. While being in a holding room the Judge did asked me if I needed the state to provide me an Attorney I did ok. After that with a brief conversation with Judge the video hearing ended. And I was then taken to my holding room.

September 23<sup>rd</sup> was my next hearing which I did show up for. In that hearing I was supposed to meet with a Judge to neither be released free because I could not afford to post a bond. In that FRIDAY SEPTEMBER 23<sup>RD</sup> HEARING THERE WAS NO JUDGE. I could not meet, or neither saw a judge on that Day I was supposed to be meeting with a judge after being placed in a Van from the Wake County Jail to the Wake County Justice Center Downtown Raleigh NC. After several hours seating in the holding room at the Justice Center, I could not meet

which was false in nature meant to Damage my reputation, and physically put me in Danger.

(1V) Injuries sustained were emotional and Physical injuries. Other Injuries but not limited to Pain and suffering, Possible eye Problem due to exposure to Light in the Prison. Damage to my reputation, lost of wages and living unable to find an appropriate place to Live, and find a job due to the unlawful arrest. Humiliation in the community, and Damage to my good standing in the community prior to this incidents.

#### (V) DEMAND FOR RELIEF

I Respectively make the following demand for Relief.

1: I Demand an Injunctive Relief from the Wake County District Attorney Office, and the 10<sup>th</sup> Judicial Circuit Court for North Carolina to Seale my arrest record from public access.

I also Demand a reasonable amount of monetary compensation that is just, and appropriate which is to be determined by this court for (a)pain and suffering.(b) Damage to my reputation (c) Lost of

income due to Defendant action that has lead me not to be able to secure an employment. I further request that this court entered any Relief deed Just and Appropriate that I could not state in this Request for Relief for the above Defendants.

(2) I Demand a Relief of 5 Million Dollars form the following Defendants The Government City of Raleigh, and the Raleigh Police Department In there Official Capacity. Officer <sup>L. Wickes</sup> Windesky In his Official, and Individual Capacities. Officer <sup>Evetta</sup> Evitta In his Official, and Individual Capacities. Officer Alonso, In Official and Individual Capacities.

(3) I Demand a Relief of 1 Million Dollars from Defendant Jane Doe. For Slander and Defamation of character. <sup>In Her Official and Individual Capacity as Greyhound Line Inc. Employee.</sup>

(4) I Demand a Monetary Relief of 50 Million Dollars from Greyhound Lines Inc for pain and Suffering, Lost of Income, emotional distress, Slander/ Defamation of Character, Damage to my reputation and good name in the community False arrest that lead to my imprisonment, lost of Housing, and Lost of Employment.

Correction of names of two Defendants are  
OFFICER Evetta OFFICER L. Wickes from the Raleigh N.C.  
police Department.



## CERTIFICATION AND STATEMENT

I Francis Keister proceeding in this matter Pro-Se rightfully attest that all statement made in this filing are real, and true to my knowledge at the time of submission to this court.

Respectfully Submitted

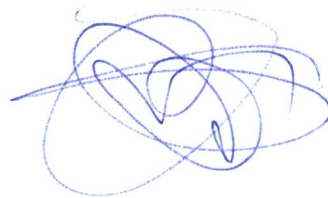
Francis Keister

7003 Glenn Dale Road

Glenn Dale, MD 20769

[abroadtim@gmail.com](mailto:abroadtim@gmail.com)

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A handwritten signature in blue ink, consisting of several overlapping loops and a final downward stroke.